



{In Archive} Fw: Cook Inlet ELGs

Cindi Godsey to: Dianne Soderlund

08/22/2008 10:58 AM

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Dianne,

Carey got it from all sides yesterday. His boss put him on the phone to discuss a mining issue with me so I asked about the coastal ELGs and apparently so did Sharmon!

----- Forwarded by Cindi Godsey/R10/USEPA/US on 08/22/2008 10:57 AM -----



Carey
Johnston/DC/USEPA/US
08/22/2008 07:15 AM

To sharmon.stambaugh@alaska.gov
cc Cindi Godsey/R10/USEPA/US@EPA
Subject Cook Inlet ELGs

Dear Sharmon:

It was a pleasure to meet you at the pretreatment meeting in Charleston, SC. As promised, here's a summary of of recent review of the Cook Inlet ELGs. We discussed the Cook Inlet issue at some length in the 2004 Effluent Guidelines Program Plan.

See Section 5.5.9.6 of the 2004 TSD: <http://epa.gov/guide/304m/2004/tsd.pdf>

A couple things to note are:

- (1) We did receive a number of comments on this issue from several Native American Cook Inlet villages and CI Keeper.
- (2) This subsector had a TWPE discharge of ~12,000, which was very small in comparison to the one existing category we did identify - CCH (millions of TWPE).
- (3) We did highlight advances in downhole disposal technology

"Newer injection technology might also make injection of produced water more available. However, EPA does not know how widely these newer technologies can be used across all Cook Inlet facilities. EPA will examine the progress of these technologies in future annual reviews. Given the 16-year lag between NSPS projects, the ability of the permit writer to require an operator to demonstrate that zero discharge is not technically feasible for a specific project, and the relatively low toxicity of the discharges, EPA decided not to revise effluent guidelines for produced water in this subcategory at this time."

In short - there many be new available and affordable treatment technology for this cluster of facilities in Cook Inlet. However, as a national issue it ranks low in terms of other discharges. That said - if you have new data or would like to discuss this in more detail, please let me or Cindi know.

Hope this helps.

Sincerely,

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